

Update

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Review: What is BACT?

- **BACT (CAA Sec. 169(3))**
 - An emission limitation based on the maximum degree of reduction ... which the permitting authority... taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such facility through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each such pollutant...
- EPA's policy: Top-Down Process

Deseret Power, Bonanza Plant

- Located on Tribal Land in Eastern Utah
- EPA is PSD permitting authority
- Permit application for new unit
 - 110 MW CFB boiler
 - Designed to be fueled with waste coal from nearby Deserado mine
 - Would join 500 MW unit firing coal from same mine
- Public comment ended July 29, 2006; Permit issued August 30, 2007

Deseret Comment Responses (Part 1 – CO₂)

- Should PSD permit set CO₂ emiss. limit?
 - Not a ‘pollutant subject to regulation’
- Should EPA consider CO₂ in BACT analysis for other pollutants?
 - Commenters did not present information on how CO₂ considerations would change BACT
 - Environmental impacts part of BACT is meant to be locally-focused

Deseret Comment Responses (Part 2 - IGCC)

- Must DP evaluate IGCC in BACT analysis?
 - No, BACT analysis is conducted without changing fundamental characteristics of proposed source
 - Permitting authority makes judgment about whether option would redefine source – here EPA determined it did
 - IGCC also precludes use of waste coal

Deseret Comment Responses (Part 2 – IGCC, continued)

- Must EPA follow States that have required IGCC in BACT analysis?
 - No, permitting authority makes reasoned assessment (e.g., is it a redefinition?)
- Should IGCC be required here because it is environmentally preferable?
 - Permit authorities can evaluate alternatives outside of BACT analysis
 - Not appropriate here (fuel source, plant size)